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Kenai Peninsula Borough Service Area  
**Seward/Bear Creek Flood Service Area Board**

302 Railway Suite #123  
P.O. Box 1554  
Seward, Alaska 99664  
(907) 224-3340  
(907) 224-5197 (Fax)  
[sbcfsa@arctic.net](mailto:sbcfsa@arctic.net)  
[www.sewardbearcreekfloodservicearea.org](http://www.sewardbearcreekfloodservicearea.org)

23 July 2008

Randy Bates, Director  
Division of Coastal and Ocean Management  
Department of Natural Resources  
PO Box 111030  
Juneau, Alaska 99811-1030

RE: Re-evaluation of ACMP

Dear Mr. Bates:

The Seward/Bear Creek Flood Service Area (SBCFSA) board has had occasion to work with the ACMP on several permit applications in the past two years. We also advise private citizens who are filing floodplain development permits with regard to the ACMP portion of their applications. The SBCFSA is a service area of the Kenai Peninsula Borough. We would like to take advantage of this opportunity to comment on our experience.

- The SBCFSA has enjoyed working with Gary Williams at the Kenai River Center and appreciates his assistance in wading through the Coastal Project Questionnaire and Certification Statement (CPQ).
- The SBCFSA supports the overall goals of the ACMP as stated in your mission statement, as well as the goal of "streamlining the application process" which we understand was part of the original intent of the program. Avoiding duplication is always a good idea.
- The SBCFSA has, however, serious objections to the evolution of the CPQ over the last couple of years and the lengthy process of approval.

The SBCFSA board recognizes that a permitting process is necessary to ensure that floodplain and coastal development is done in way that does not infringe on the rights of upstream and downstream neighbors, the wildlife habitats or the environmental quality. We also know that the best way to obtain compliance from property owners is to make the permit application process as convenient and understandable as possible. The Kenai River Center, with its Multi Agency Permit Packet, seemed to have accomplished exactly that. The CPQ portion of that packet consisted of 8 pages. Over the last year, the CPQ

portion of the packet has grown to 19 pages, more than doubled! It is now also necessary for the applicant to contact separately each and every agency that might have the least interest in the project and to fill out their individual permits as well. For any private citizen trying to build a home, or even a shed on his property, this is overwhelming. When this application is applied to a simple dredging project designed for flood mitigation it is ridiculous. The whole purpose of the Multi-Agency Permit was to eliminate the need to contact a confusing and seemingly endless number of agencies. We are moving backwards.

The Seward/Bear Creek Flood Service Area would like to encourage the ACMP to reconsider the direction it has taken with regard to the CPQ.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Williamson", with a stylized flourish at the end.

Bill Williamson, Chairman  
Seward/Bear Creek Flood Service Area

BW/cs

Cc: Commissioner Tom Irwin, Alaska Department of Natural Resources  
Mayor John Williams, Kenai Peninsula Borough  
John Mohorcich, Kenai River Center Manager  
Jane Gabler, KPB Planner/Floodplain Administrator  
Kevin Lyon, KPB Projects Director  
Scott Walden, KPB Office of Emergency Management  
Taunie Boothby, Floodplain Manager, Division of Community & Regional Affairs  
Christy Miller, Program Manager, Tetra Tech  
Gary Williams, Coastal Zone Manager